

# MEMO ENDORSED

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DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 8/4/2016

August 4, 2016

**Via ECF**

The Honorable Valerie Caproni  
United States District Court  
Southern District of New York  
40 Foley Square, Room 240  
New York, NY 100070

**Re: GoTech LLC v. Spigen Inc., Civil Action No. 1-16-CV-4944**

Dear Judge Caproni:

Plaintiff GoTech LLC seeks adjournment of the joint letter, case management plan, and ultimately the pretrial conference for at least a month as Defendant Spigen Inc. has not yet answered. The joint letter and case management plan are due August 5, 2016 and the initial pretrial conference is set for August 12, 2016.

Currently, Spigen Inc. has not answered or otherwise responded to the complaint. Thus, GoTech LLC is unaware of who will be representing Defendant and has no one to communicate with about the case. Therefore, GoTech LLC respectfully requests an extension for at least a month which would allow Defendant to obtain counsel, respond, and engage in discussions with Plaintiff. This is the first request for an adjournment and extension of time in this action. The other party does not have counsel yet, so is unable to consent. This request does not affect any other scheduled dates, as the Court has not yet entered a scheduling order.

Although this request has not been made at least two business days prior to the deadline as instructed in the individual practices in civil cases, this request was made as soon as possible. It was thought that Spigen could possibly answer or respond in time to avoid this request as their answer is due Monday, August 8, 2016.

On behalf of GoTech LLC, I hereby respectfully request that Your Honor push back the joint letter deadline, case management plan, and ultimately the pretrial conference until at least September 9, 2016.

Request GRANTED, in part. The initial pretrial conference currently scheduled for August 12, 2016 is ADJOURNED until August 26, 2016 at 10:00 a.m. The parties' deadline for filing their joint letter, as described in the July 1, 2016 Notice of Initial Pretrial Conference (Dkt. 6) is ADJOURNED until August 19, 2016. SO ORDERED. August 4, 2016

Sincerely,

/s/ Lawrence C. Hersh

Lawrence C. Hersh

Attorney for Plaintiff GoTech LLC



HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE

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